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October 27, 2005

Hon. James H. Welsh Commissioner of Conservation Office of Conservation Post Office Box 94275 Baton Rouge, Louisiana 70804-4275

Re:

2nd Duhon Sand, Reservoir A

Perry Field

Vermilion Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **BROWNING OIL COMPANY**, **INC.** for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of an order pertaining to the following matters relating to the 2nd Duhon Sand, Reservoir A, in the Perry Field, Vermilion Parish, Louisiana, for which rules and regulations were established and a single drilling and production unit was created for the exploration for and production of gas and condensate by Office of Conservation Order No. 435-C, effective September 24, 1985, said unit designated 2nd DUHON RA SUA:

- 1. To permit the applicant to drill, designate and utilize its Noel, et al No. 1 Well as substitute unit well for the 2ND DUHON RA SUA, said well located as shown on the plat attached hereto.
- 2. To find that the proposed substitute unit well at the location shown on the attached plat is necessary to efficiently and economically drain a portion of the reservoir covered by the unit in which it is situated which cannot be so drained by any existing well within such unit.
- 3. To designate Browning Oil Company, Inc. as unit operator.

- 4. Except to the extent contrary herewith, to continue in full force and effect the provisions of Office of Conservation Order No. 435-C, the unit created thereby, and applicable Statewide Orders.
- 5. To consider such other matters as may be pertinent.

The 2nd Duhon Sand, Reservoir A, in the Perry Field, Vermilion Parish, Louisiana, was defined in Office of Conservation Order No. 435-C, effective September 24, 1985.

The existing unit well has been plugged and abandoned. It is the applicant's opinion that the proposed substitute unit well is necessary to efficiently and economically drain that portion of the reservoir covered by subject unit and that such drilling, designation and use will be in the interest of conservation and will cause no harm or injury to others.

Attached hereto and made a part hereof is a plat outlining the applicant's proposal, along with a list of the names and addresses of the Interested Owners, Represented Parties and Interested Parties to whom a copy of this application is being sent. Pursuant to the Revised Rules of Procedure, the list of parties is being furnished only to the Commissioner of Conservation and to the District Manager of the Shreveport District of the Office of Conservation; however, the list of parties will be provided to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Interested Parties and Represented Parties.

Finally, enclosed is our check on behalf of the applicant, in the amount of \$755.00 made payable to the Office of Conservation and representing the required hearing application fee.

Very truly yours,

RWRjr/dbf Enclosures Richard W. Revels, Jr.

cc: Mr. Richard Hudson, Lafayette District Office of Conservation cc: Interested Owners, Represented Parties and Interested Parties

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